



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
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June 24, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of West Side Telephone Company  
Study Area Code 200277**

Dear Ms. Dortch:

On behalf of West Side Telephone Company (“West Side”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.<sup>1</sup> West Side seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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phone: 301-459-7590, fax: 301-577-5575  
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June 24, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of West Side Telephone Company  
Study Area Code 200277  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client West Side Telephone Company (“Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Lori Hindman
<035>	Contact Telephone Number: Number of the person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	hindman@westsidetel.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed	0.0	<input checked="" type="checkbox"/>
<420>	Mobile	0.0	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>
<440>	Fixed	0.0	<input checked="" type="checkbox"/>
<450>	Mobile	0.0	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>
<510>	200277wv510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>
<610>	200277wv610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>
<1010>		(attach descriptive document)	<input checked="" type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

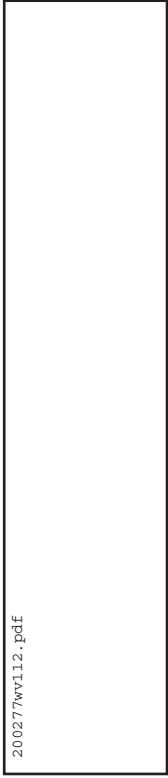
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes / no)             </div> <div> <input type="radio"/> (yes / no)             </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Lori Hindman 3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

[illegible]

(700) Price Offerings including Voice Rate Data  
Data Collection Form

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contract Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

1/1/2015	
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[illegible]







(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

<910>	Tribal Land(s) on which ETC Serves	
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<920>	Tribal Government Engagement Obligation	
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Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

<b>(1100) No Terrestrial Backhaul Reporting</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>200277wv1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JOE HINDMAN
<035>	Contact Telephone Number - Number of person identified in data line <030>	3045536611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westside1.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information	

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}


Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

Certification Support Used to Build Broadband

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Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification


Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

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<2021> Interim Progress Community Anchor Institutions

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Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	
Data Collection Form	
FCC Form 481	
OMB Control No. 3060-0986/OMB Control No. 3060-0819	
July 2013	

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div>200277wv3010.pdf</div> <div>Name of Attached Document Listing Required Information</div>
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div><input checked="" type="checkbox"/></div>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div>200277wv3012.pdf</div> <div>Name of Attached Document Listing Required Information</div>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div><input type="checkbox"/></div>
(3014)	If yes, does your company file the RUS annual report	<div><input type="checkbox"/></div>
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div><input type="checkbox"/></div>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input type="checkbox"/></div>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div><input type="checkbox"/></div>
(3018)	If the response is no on line 3014, Is your company audited?	<div><input type="checkbox"/></div>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<div><input type="checkbox"/></div> <div><input type="checkbox"/></div>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input checked="" type="checkbox"/></div>
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	<div><input checked="" type="checkbox"/></div>
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<div><input type="checkbox"/></div>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<div><input type="checkbox"/></div>
(3024)	Underlying information subjected to an officer certification.	<div><input type="checkbox"/></div>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input type="checkbox"/></div>
(3026)	Attach the worksheet listing required information	<div>200277wv3026.pdf</div> <div>Name of Attached Document Listing Required Information</div>

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	



<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer: ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	200277
<015> Study Area Name	WEST SIDE TEL-WV
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035> Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>John R. Ludenia</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John R. Ludenia
Name of Reporting Carrier:	WEST SIDE TEL-WV
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/23/2015
Printed name of Authorized Officer:	John Ludenia
Title or position of Authorized Officer:	Vice President and GM
Telephone number of Authorized Officer:	3049838642 ext.
Study Area Code of Reporting Carrier:	200277 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	WEST SIDE TEL-WV
Name of Authorized Agent or Employee of Agent:	Lisa McLaughlin
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/23/2015
Printed name of Authorized Agent or Employee of Agent:	Lisa McLaughlin
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.
Study Area Code of Reporting Carrier:	200277 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

**West Side Telephone Company – West Virginia**

**Study Area Code: 200277**

**Response to Lines 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance, Voice and Broadband**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

West Side Telephone Company (“Company”) hereby certifies that it complies with applicable service quality standards and consumer protection rules under Section 150-6-1 through 150-6-6 as established by the West Virginia Public Service Commission in Title 150 Legislative Rule Public Service Commission, Series 6, Rules and Regulations for the Government of Telephone Utilities.

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

These obligations include, but are not limited to, the following: (1) filing the Company's applicable tariffs which disclose rates, terms and conditions of service to customers (2) adherence to state consumer protection requirements governing telephone providers; and (3) service quality standards requirements. In addition, the Company complies with numerous federal consumer protection standards including, but not limited to: (1) Truth-in-Billing rules outlined in 47 CFR § 64.2401; and (2) compliance with Federal CPNI rules, Red Flag rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under West Virginia statutes, the Company discloses rates, terms and conditions on its public web site and the Company complies with applicable federal and state customer protection standards generally applicable to all businesses operating in West Virginia. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

**West Side Telephone Company – West Virginia**

**Study Area Code: 200277**

**Response to Lines 610 - Ability to Function in Emergency Situations, Voice and  
Broadband**

West Side Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).<sup>1</sup> The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with the West Virginia Public Service Commission 150.6-3 Engineering, Title 150 Legislative Rule Public Service Commission, Series 6, Rules and Regulations for the Government of Telephone Utilities. Provisions include obligations for continuity of service and emergency operations planning and service provision capability requiring that switching locations without installed emergency power facilities there shall be a mobile power unit available which can be delivered and connected on short notice. Additionally, at switching locations serving in excess of five thousand (5,000) lines, a permanent auxiliary power unit shall be installed. Company

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

exchanges do have installed stationery power, however, they do not exceed the 5,000 line threshold and therefore do not have permanent auxiliary power.

The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.



REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	200277
<015>	Study Area Name	WEST SIDE TEL-WV
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lori Hindman
<035>	Contact Telephone Number - Number of person identified in data line <030>	3049838611 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	hindman@westsidetel.com

1/1/2015	
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	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge
<701>		
<702>		

[illegible]

[illegible]

[illegible]

## West Side (WV) Telephone Company

**Study Area Code: 200277**

### Rates, Terms and Conditions for Lifeline Service

**(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for basic local exchange service and facilities only. The rates for other ancillary services not specifically shown below are presented in West Side (WV) Telephone Company's tariff(s) on file with the Public Service Commission of West Virginia. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:<sup>(1)(2)</sup>

<b>Residential Plan</b>	<b>R-1 Rate</b>	<b>Res. EAS Charge</b>
Plan 1 – Economy rate exchange service which provides measured rate calling only, no usage charge allowance.	\$ 4.50	\$ -
Plan 2 – Flat rate calling only within the originating exchange or zone and there is no usage charge allowance to calls terminating in other exchanges or zones of the local service area.	\$ 10.50	\$ -
Plan 3 – Flat rate calling to specified areas with measured calling to all other exchanges or zones within the local service area and has no usage charge allowance.	\$ 14.25	\$ -
Plan 4 – Flat rate calling to all exchanges or zones within the local service area.	\$ 27.45	\$ -

<sup>(1)</sup> Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to West Virginia Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

<sup>(2)</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
First Revised Sheet 1  
Cancels Original Sheet 1

#### S14. TEL-ASSISTANCE SERVICE

##### S14.1 General

Tel-Assistance Service is an offering designed to help qualified customers pay for their Local Exchange Service. Such qualified customers are charged a reduced rate for their local telephone service. Customers qualify for Tel-Assistance Service if:

1. The subscriber, or one or more of the subscriber's dependents or the subscriber's household, receives benefits from at least one of the following qualifying programs:

Medicaid;

Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps;

Supplemental Security Income (SSI);

Federal Public Housing Assistance;

Low-Income Home Energy Assistance Program (LIHEAP);

National School Lunch Program's free lunch program;

Temporary Assistance for Needy Families (TANF);

Benefits under other income related state or federal programs.

2. Other eligibility requirements may be established by the Commission.

(C) Change

Issued by authority of an Order of the Public Service Commission of West Virginia in  
Case No. 12-1038-T-T dated August 16, 2012, effective August 24, 2012.

West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
Original Sheet 1a

#### S14. TEL-ASSISTANCE SERVICE

##### S14.2 Regulations

1. Tel-Assistance Service is available to qualified customers and is provided via a residence message or measured rate individual line.
2. Tel-Assistance Service is Local Exchange Service, and as such, is subject to the regulations governing Local Exchange Service in Section 5 of this Tariff. The rates specified herein for Tel-Assistance Service apply in lieu of the rates for Local Exchange Service in Section 5 preceding, except as may otherwise be specified following.
3. In order to qualify for Tel-Assistance Service, a customer must be certified by the Department of Health and Human Resources to the Telephone Company as eligible for Tel-Assistance Service. (C)
4. Tel-Assistance Service will continue to be provided to a customer only so long as such customer is certified as eligible by the Department of Health and Human Resources. Eligibility for Tel-Assistance Service shall be subject to initial and continuing verification by the Department of Health and Human Resources. (C)  
|  
(C)
5. When the Telephone Company receives notice from the Department of Health and Human Resources, or from the customer, that the customer is no longer eligible for Tel-Assistance Service, the Telephone Company will then notify the customer that the Tel-Assistance Service will be discontinued or changed to another class of residence service. (C)  
(C)

(C) Change

Issued by authority of an Order of the Public Service Commission of West Virginia in Case No. 12-1038-T-T dated August 16, 2012, effective August 24, 2012.

West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
First Revised Sheet 2  
Cancels Original Sheet 2

#### S14. TEL-ASSISTANCE SERVICES

##### S14.2 Regulations (continued)

6. No other Local Exchange Service may be provided in the same household with a Tel-Assistance Service to either the Tel-Assistance Service customer or any other person. On addition, a Tel-Assistance Service customer may not subscribe to foreign central office, foreign exchange or foreign zone services. (C)
7. A Tel-Assistance Service includes a usage allowance of up to \$2.00 per month, for local usage, excluding optional calling plans, or any combination thereof. (C)
8. No Service ordering/record charge or central office Line Connection Charge shall apply for changing a customer to or from Tel-Assistance Service.
9. A first-time Tel-Assistance subscriber may, at his or her options and for a period of 120 days following the commencement of his or her Tel-Assistance Service, change back to the service his or e had immediately prior to commencement of his or her Tel-Assistance Service, and the following regulations will be in effect for such change of service.
  - (1) No non-recurring service charges will apply.
  - (2) The customer will be billed only exchange rates and charges for the time that his or her Tel-Assistance Service was in effect that would have been charged for that period had the subscriber not made a service change within the period.
10. The Telephone Company shall not disconnect or interrupt a Tel-Assistance customer for failure to pay toll or long distance charges.

(C) Change

Issued by authority of an Order of the Public Service Commission of West Virginia in Case No. 12-1038-T-T dated August 16, 2012, effective August 24, 2012.



West Side Telephone Company DBA  
West Side Telecommunications

Section 14  
First Revised Sheet 3  
Cancels Original Sheet 3

S14. TEL-ASSISTANCE SERVICE

S14.2 Regulations (continued)

11. A Tel-Assistance customer who may be required to pay a deposit will have the deposit waived if the customer voluntarily elects Tel-Assistance Toll Restriction Service. This service is available and is provided free of charge. Tel-Assistance Toll Restriction service allows the completion of local calls, calls to the operator for the completion of collect and third number billed calls, calls to 911 and other N11 service codes, calls to Toll Free Service telephone numbers and local directory Assistance calls. However, this service prevents the origination of all IntraLATA, InterLATA and interstate calls, 700/900 calls, calls to non-local Directory Assistance, as well as the use of an Operator Service, Verification and Interrupt Service. In addition, this service prevents the billing of collect and third number calls to the Tel-Assistance Line. (C)
12. The Telephone Company may initiate Tel-Assistance Toll Restriction Service if a Tel-Assistance customer has a delinquent balance for toll and/or long distance charges of \$20.00 or more. (C)
13. The federal subscriber line charge is waived for Tel-Assistance lines.

S14.3 Rates

	Per Month	
Tel-Assistance Service	\$3.75	(D)

(D) Decrease  
(C) Change

Issued by authority of an Order of the Public Service Commission of West Virginia in  
Case No. 12-1038-T-T dated August 16, 2012, effective August 24, 2012.



**West Side Telephone Company – West Virginia**

**Study Area Code: 200277**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

West Side Telephone Company – West Virginia hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

[illegible]

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**